

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE; MISSISSIPPI STATE CONFERENCE OF THE NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE; JACKSON CITY BRANCH OF THE NAACP; DERRICK JOHNSON; FRANK FIGGERS; CHARLES TAYLOR; MARKYEL PITTMAN; CHARLES JONES; and NSOMBI LAMBRIGHT-HAYNES,

Plaintiffs,

v.

TATE REEVES, in his official capacity as Governor of the State of Mississippi; SEAN TINDELL, in his official capacity as Commissioner of Public Safety; BO LUCKEY, in his official capacity as Chief of the Mississippi Department of Public Safety Office of Capitol Police; MICHAEL K. RANDOLPH, in his official capacity as Chief Justice of the Mississippi Supreme Court; and LYNN FITCH, in her official capacity as Attorney General of the State of Mississippi,

Defendants.

Case No. 3:23-cv-272-HTW-LGI

**MOTION FOR ADMISSION OF
DAVID T. LEAPHEART PRO
HAC VICE AS A COUNSEL FOR
NAACP**

COMES NOW Carroll Rhodes, a member of the Mississippi Bar, in good standing, and a member of the Bar of this Court, and moves the admission of David T. Leapheart, pro hac vice, as a counsel for NAACP. Attached to this Motion are the application for admission pro hac vice submitted by David T. Leapheart along with a certificate of his admission to the Bar of the District of Columbia.

The undersigned submits that David T. Leapheart has not been admitted in any other case in this jurisdiction.

The filing fee of \$100.00 has been paid.

WHEREFORE, PREMISES CONSIDERED, Carroll Rhodes moves the Court for the admission of David T. Leapheart, pro hac vice, as a counsel for NAACP. Respectfully submitted this 4th day of August, 2023.

/s/ Mark H. Lynch

Eric H. Holder, Jr. ,* DC Bar # 303115
Megan A. Crowley,* DC Bar # 1049027
Gary S. Guzy,* DC Bar # 375977
Mark H. Lynch,* DC Bar # 193110
Brenden J. Cline,* DC Bar # 1021317
COVINGTON & BURLING LLP
One CityCenter
850 Tenth Street NW
Washington, DC 20001
Tel: (202) 662-6000
Fax: (202) 662-6291
eholder@cov.com
mcrowley@cov.com
gguzy@cov.com
mlynch@cov.com
bcline@cov.com

Counsel for NAACP

**Pro Hac Vice*

***Pro Hac Vice pending*

/s/ Carroll Rhodes

Carroll Rhodes, MS Bar # 5314
LAW OFFICES OF CARROLL RHODES
POST OFFICE BOX 588
HAZLEHURST, MS 39083
Telephone: (601) 894-4323
Fax: (601) 894-1464
crhode@bellsouth.net

Joe R. Schottenfeld,* DC Bar # 1735796
Evan Walker-Wells,** NY Bar # 6050645
**NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED
PEOPLE**
4805 Mt. Hope Drive
Baltimore, MD 21215
Tel: (410) 580-5777
Fax: (410) 358-9350
jschottenfeld@naacpnet.org
ewells@naacpnet.org

Counsel for All Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on August 4, 2023, I electronically filed the foregoing Motion with the Clerk of the Court by using the Court's PACER/CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Carroll Rhodes
Carroll Rhodes